

## **ATTACHMENT 3-3 DTTF INSPECTION SCHEDULE**

### **1.0 INTRODUCTION**

This attachment presents inspection requirements for the Dugway Thermal Treatment Facility (DTTF) required by R315-8-2.6 and is organized in the following sections:

- General inspection requirements, and
- Specific process inspection requirements.

### **2.0 GENERAL INSPECTION REQUIREMENTS: 40 CFR 270.14(b)(5), 264.15, 264.33; R315-8-2.6(a) and (b), R315-8-3.4**

Inspections of the DTTF are performed to prevent, detect, and respond to environmental or human health hazards that may occur at the facility. Inspections are conducted on a monthly and/or per-event basis using Forms 1 – 4 as necessary. DTTF inspections are under the direction of the DTTF Site Manager. The DTTF Site Manager will be responsible for maintaining the inspection record for three years in accordance with R315-8-2.6. Information recorded during an inspection includes the date and time of inspection, the name of the inspector, observations made, and the nature of repairs or remedial actions performed.

Repairs or replacement of any deteriorated or malfunctioning equipment will be initiated immediately or as soon as is practicable to ensure that the problem does not threaten human health or the environment. Where a hazard is imminent or has already occurred, remedial action will begin immediately. Potential environmental problems at the DTTF include unexploded ordnance (UXO) and scrap metal resulting from open detonation (OD) as well as residual ash on the ground surface from open burning (OB). These problems, if found during the inspections, are corrected immediately. If any vital equipment is inoperative, deteriorated, or not in compliance with specific conditions, maintenance is initiated or the equipment is replaced before further operations commence.

The inspection requirements include determination of the condition and/or availability of the following equipment and security devices necessary for operation of the DTTF:

- Operating/Structural Equipment (see DTTF Facility Description, Attachment 3-1),
- Safety/Emergency Equipment (see DTTF Preparedness and Prevention Plan, Attachment 3-6), and
- Security Devices (see DTTF Security Plan, Attachment 3-3).

### **3.0 SPECIFIC PROCESS INSPECTION REQUIREMENTS**

This section presents inspection requirements for the following equipment or facilities:

- Containers,
- Tank systems,
- Waste piles,
- Surface impoundments, and
- Incinerators.

**3.1 CONTAINER INSPECTION: 40 CFR 264.174; R315-8-9.5**

DPG will not manage any containers at the DTTF Area as a treatment, storage, and disposal facility.

**3.2 TANK SYSTEM INSPECTION: 40 CFR 264.195; R315-8-10**

DPG will not operate tank systems at the DTTF Area.

**3.3 WASTE PILE INSPECTION: 40 CFR 264.254(b); R315-8-12.3(b)**

DPG will not operate waste piles at the DTTF Area.

**3.4 SURFACE IMPOUNDMENT INSPECTION: 40 CFR 264.226(b) and (c); R315-8-11.7(b) and (c)**

DPG will not operate surface impoundments at the DTTF Area.

**3.5 INCINERATOR INSPECTION: 40 CFR 264.347; R315-8-15.8**

DPG will not operate incinerators at the DTTF Area.

**Form 1. Monthly DTTF Inspection.**

**Group Responsible:** \_\_\_\_\_

**Date:** \_\_\_\_\_

Inspection Item	Inspection Components	Inspection Date and Time	Deficiencies	Inspector Name (printed and signature)
Records Inspection	<input type="checkbox"/> Check for presence of all pertinent permits, operating procedures, and manuals. (Updated permit and SOPs) <input type="checkbox"/> Check for presence of complete and up-to-date operating records. (Including shipping documentation, destruction orders, T004 form, meteorological records, etc.) <input type="checkbox"/> Check that per-event inspection records are up to date. (Including forms from EOD and others) <input type="checkbox"/> Check that personnel training records are up to date. (All persons signing inspection forms should have annual RCRA Site Specific & Contingency Plan training)			
Site Inspections	<input type="checkbox"/> Ensure that at least one "after event" inspection has been completed for both OB & OD areas. (Attach inspection forms if necessary) <input type="checkbox"/> Check for water that may have accumulated in the burn pans. (Water is to be containerized for proper subsequent characterization and disposal)			
Emergency Response Equipment	Ensure that emergency response equipment (Preparedness and Prevention Plan, Attachment 3-6) is available and in good condition. <input type="checkbox"/> First aid kit, fire extinguisher, and two-way radios in operator vehicle <input type="checkbox"/> Emergency telephone on Durand Road			

Deficiencies = Listed items have been inspected and found to be in compliance with permit requirements

**Form 2. Per-Event Open Burn.**

**Group Responsible:** \_\_\_\_\_

**Date:** \_\_\_\_\_

Inspection Item	Inspection Components	Inspection Date and Time	Deficiencies	Inspector Name (printed and signature)
<b>Before Each OB Event</b>				
Environmental Data	<input type="checkbox"/> Inspect waste munitions and compare with shipping documentation in accordance with the DTTF Waste Analysis Plan (Attachment 3-2). <input type="checkbox"/> Ensure that loading and unloading treatment areas are inspected prior to use. <input type="checkbox"/> Ensure that destruction orders and certificates are completed including records for each waste munition, quantities, etc. <input type="checkbox"/> Ensure that the total net explosive weight is less than 1000 lbs. <input type="checkbox"/> Ensure that meteorological conditions and air clearance data are recorded and are acceptable to allow for DTTF operations. Ensure that appropriate notifications have been given including Range Control, security, emergency response and environmental personnel, etc.			
Safety and Emergency Equipment	<input type="checkbox"/> Ensure that emergency response equipment (Preparedness and Prevention Plan, Attachment 3-6) is available and in good condition.			
Security Equipment	<input type="checkbox"/> Check warning signs at entrance to DTTF Area.			
Burn Pan Site	<input type="checkbox"/> Check that the area surrounding the burn pan is free of brush and other combustible items within a 200-foot radius.			
Burn Pan	<input type="checkbox"/> Check under the burn pan for evidence of releases (such as ash or stains). <input type="checkbox"/> Check welds and seams for cracks that could cause releases. <input type="checkbox"/> Check to make sure cover is free of cracks and holes and it opens freely. <input type="checkbox"/> Check inside the pan for and remove all debris			

Inspection Item	Inspection Components	Inspection Date and Time	Deficiencies	Inspector Name (printed and signature)
	including snow, ice, and water. (Water is to be containerized, characterized and properly disposed of) <input type="checkbox"/> Check fire bricks (if present) for cracks, chips, and wear. <input type="checkbox"/> Check that propellant is no more than 3 inches deep in pan.			
<b>After Each OB Event</b>				
Burn Pan Site	<input type="checkbox"/> Check for fires. <input type="checkbox"/> Check for completeness of burn. <input type="checkbox"/> Check OB area for ejected PEP and if munitions containing white phosphorus were treated, visually confirm that all residues are inert and there is no remaining white phosphorus residue.			
Burn Pan	<input type="checkbox"/> Collect ash residue, if present. <input type="checkbox"/> Check that cover closes easily. <input type="checkbox"/> Check that cover security latch (or strapping) is in place to prevent the wind from blowing off the cover. <input type="checkbox"/> Check burn pan and cover for excessive warping that may prevent effective use.			
Environmental Operating Records	<input type="checkbox"/> Ensure that copies of all records and certificates are given to the Site Manager.			
Comments:				

Deficiencies = Listed items have been inspected and found to be in compliance with permit requirements

**Form 3. Per-Event Open Detonation.**

**Group Responsible:** \_\_\_\_\_

**Date:** \_\_\_\_\_

Inspection Item	Inspection Components	Inspection Date and Time	Deficiencies	Inspector Name (printed and signature)
<b>Before Each OD Event</b>				
Environmental Data	<input type="checkbox"/> Inspect waste munitions and compare with shipping documentation in accordance with the DTTF Waste Analysis Plan (Attachment 3-2). <input type="checkbox"/> Ensure that loading and unloading treatment areas are inspected prior to use. <input type="checkbox"/> Ensure that destruction orders and certificates are completed including records for each waste munition, quantities, etc. <input type="checkbox"/> Ensure that the total net explosive weight is less than 1500 lbs. per event. <input type="checkbox"/> Ensure that meteorological conditions and air clearance data are recorded and are acceptable to allow for OB/OD operations. <input type="checkbox"/> Ensure that appropriate notifications have been given including Range Control, security, emergency response and environmental personnel, etc.			
Safety and Emergency Equipment	<input type="checkbox"/> Ensure that emergency response equipment (Preparedness and Prevention Plan, Attachment 3-6) is available and in good condition.			
Security Equipment	<input type="checkbox"/> Check warning signs at entrance to DTTF Area.			
Detonation Area	<input type="checkbox"/> Check that area is free of brush for ease of locating UXO and fragments. <input type="checkbox"/> Ensure that operating record includes general location of the detonation area.			
<b>After Each OD Event</b>				

Inspection Item	Inspection Components	Inspection Date and Time	Deficiencies	Inspector Name (printed and signature)
Detonation Area	<input type="checkbox"/> Check for fires. <input type="checkbox"/> Check OD area for UXO or fragments and if any munitions containing white phosphorus were treated, visually confirm that all residues are inert and there is no remaining white phosphorus residue. <input type="checkbox"/> Assess the need to backfill and level craters caused by detonation and if white phosphorus was treated, grading the site to ensure complete reaction of white phosphorus			
Environmental Operating Records	<input type="checkbox"/> Ensure that copies of all records and certificates are given to the Site Manager.			
Comments:				

Date/Time/Signature = Listed items have been inspected and found to be in compliance with permit requirements

**Form 4. DTTF Compliance Review (optional).**

**Group Responsible:** \_\_\_\_\_

**Date:** \_\_\_\_\_

Inspection Item	Inspection Components	Inspection Date and Time	Deficiencies	Inspector Name (printed and signature)
DTTF Site Manager	<input type="checkbox"/> Check for presence of all pertinent permits, operating procedures, and manuals. (Updated permit and SOPs) <input type="checkbox"/> Check for presence of complete and up-to-date operating records. (Including shipping documentation, destruction orders, T004 form, meteorological records, etc.) <input type="checkbox"/> Check that per-event inspection records are up to date. (Including forms from EOD and others) <input type="checkbox"/> Check that personnel training records are up to date. (All persons signing inspection forms should have annual RCRA Site Specific & Contingency Plan training)			
Inspection Forms	<input type="checkbox"/> For each month, ensure that at the monthly inspection and at least one “after event” inspection has been completed for both OB & OD areas			
Environmental Monitoring	<input type="checkbox"/> Ensure that annual soil sampling has been conducted at the DTTF (see 3-09, Section 3.9) and that records are up to date			
Comments:				

Deficiencies = Listed items have been inspected and found to be in compliance with permit requirements